

EXHIBIT B

Judd Burstein

From: Tyrone Blackburn <tblackburn@tablackburnlaw.com>
Sent: Wednesday, October 13, 2021 7:11 PM
To: Judd Burstein
Subject: Re: Hough v. Maraj -- Dkt. No. 210CV-04568 (E.D.N.Y.)

Judd,

You can file your opposition and explain to the court why your client believes that her and her husband are above the law. I do not consent to an extension.

Regards.

Tyrone A. Blackburn, Esq.
T. A. Blackburn Law, PLLC
TABlackburnlaw.com

On Oct 13, 2021, at 6:43 PM, Judd Burstein <jburstein@burlaw.com> wrote:

Dear Mr. Blackburn:

I expect to file a Notice of Appearance tomorrow on behalf of Nicki Minaj in the above-referenced action (albeit without conceding that the Court has personal jurisdiction over Ms. Minaj). I am aware that you filed a Request for a Certificate of Default on October 11, 2021. I am writing to ask that you voluntarily withdraw your request and agree to an extension of the time, until November 1, 2021, to answer or move against the Complaint. Otherwise, we will both waste our time litigating a motion, on which Ms. Minaj will surely prevail, to set aside the default.

Please let me know whether you will agree to my request at your earliest convenience.

Judd Burstein
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New York, New York 10016

(212) 974-2400

(212) 974-2944 (Fax)

(917) 687-2981 (Cell—Best number)

**MY APOLOGIES IN ADVANCE FOR ANY TYPOGRAPHICAL AND/OR
GRAMMATICAL ERRORS. I AM A TERRIBLE TYPIST AND PROOFREADER
– PARTICULARLY WHEN I AM DRAFTING AN EMAIL UNDER TIME
PRESSURE.**